

Appendix

No. 6.2

Provision of TRS

FCC Order Ref. 90- 571	FCC Requirement	AT&T RELAY SERVICES
Provision of Services		
d 64.603	<p>Each common carrier providing telephone voice transmission services shall provide, not later than July 26, 1993, in compliance with the regulations prescribed therein, throughout the area in which it offers services, telecommunications relay services, individually, through designees, through a competitively selected vendor, or in concert with other carriers.</p>	<p><i>AT&T Relay Services was the first organization to provide 24/7/365 relay services. AT&T recently celebrated 20 years of serving the Deaf/HOH community.</i></p>
	<p>Speech-to-speech relay service shall be provided by March 1, 2001.</p>	<p><i>AT&T is fully compliant with the FCC requirement of offering Speech-TO-Speech Relay Service. This is a standard offering via Pennsylvania Relay Services.</i></p>
	<p>Interstate Spanish language relay service shall be provided by March 1, 2001.</p>	<p><i>AT&T is fully compliant with the FCC requirement of offering Spanish language relay services.</i></p>
	<p>In addition, not later than October 1, 2001, access via the 711 dialing code to all relay services as a toll free call.</p>	<p><i>AT&T is fully compliant with 711 access to all of its Relay Services. Pennsylvania customers dial 711 and their calls are routed to our call-handling centers for processing.</i></p>
Operational Standards		
d 64.604 A.(1).I	Communications Assistant (CA) Competency Skills	

CAs are to be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities. *AT&T Relay exceeds this FCC standard by requiring that training of Relay CAs includes special call type processing, cross cultural training, and on-going training.*

<p>d 64.604 A.(1).ii</p>	<p>CAs must have competent skills in typing, grammar, spelling, and interpretation of typewritten ASL, familiarity with hearing and speech disability cultures, languages, and etiquette.</p>	<p><i>All CAs are tested and evaluated to ensure Relay skills meet FCC Guidelines. CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures, with relay etiquette and with ASL translation. All AT&T Relay CAs are tested for grammar and spelling competency prior to being employed by AT&T Relay Services.</i></p>
<p>d 64.604 A.(1).iii</p>	<p>Typing Speed - 60 WPM with technological aids</p>	<p><i>Each AT&T Relay CA is required to take an annual typing test and qualify at minimum of 60 wpm without technological aids.</i></p>
<p>Oral-to-type tests</p>		<p><i>All AT&T Relay CAs are tested annually on dictation-type tests where they must type from spoken conversation. Test verbiage is consistently new material that CAs have not had previous exposure to.</i></p>
<p>d 64.604 A.(1).iv</p>	<p>VRS 'qualified' Interpreters</p>	<p><i>AT&T Relay Services does not currently provide Video Relay Services for the State of PA.</i></p>
<p>d 64.604 A.(1).v</p>	<p>In-call Replacement of CAs</p>	

CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of 10 minutes.

AT&T Relay meets the FCC requirement. Change of CAs during a call is discouraged. A CA must stay on a STS call for a minimum of 15 minutes or on a non-STS call for a minimum of ten minutes. If a change is necessary, both parties shall be informed. If a change of CAs is requested by the TTY or standard phone user without explanation, it shall be done without question. Both parties are informed of a change in CA by the words "relief CA XXX (M/F)".

STS CAs – 15 minutes.

All AT&T Relay CAs stay on a STS call for a minimum of 15 minutes as required.

d64.604.A.(1).vi	CA Gender Preferences	
	<p>TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.</p>	<p><i>At the onset of a relay call, a CA's gender and ID number is given to the caller. In the event that a call is transferred, the new CA will also provide their ID and gender. Upon request of the Relay user, the CA will transfer the call to the requested gender.</i></p>
Conversations transmitted in real time		
d64.604.A.(1).vii	<p>TRS shall transmit conversations between TTY and voice callers in real time.</p>	<p><i>AT&T Relay Services transmits conversations in real time as required by the FCC.</i></p>
Confidentiality & Conversation Context		
d64.604.(2).i		
	<p>CAs are prohibited from disclosing the content of any relayed conversation regardless of content</p>	<p><i>AT&T Relay has written confidentiality policies in place and copies are provided to users upon request. CAs are reviewed on the Code of Ethics and the Pledge of Confidentiality on a regular basis. AT&T Relay CAs are trained and evaluated to ensure all aspects of confidentiality are maintained and conversational context is properly provided.</i></p> <p><i>AT&T Relay CAs are prohibited from disclosing any call content.</i></p>

	<p><i>If a user is in an emergency or life-threatening situation or causes an emergency situation to exist by threatening the CA or the Relay Center, names and specific information may be disclosed by the CA to a supervisor to expeditiously address the situation. In the case of threats against the Relay center, CAs, Supervisors, or Other Personnel, such information may be disclosed to appropriate law enforcement agencies.</i></p>
<p>Certain exceptions are provided for Speech-to-Speech calls.</p>	<p><i>When processing PA Relay calls, STS CAs are permitted to retain info from a call in order to facilitate the completion of consecutive subsequent calls.</i></p>
<p>d 64.604 A.2.ii CAs are prohibited from intentionally altering a relayed conversation and must relay all conversation verbatim unless specifically requested to do otherwise</p>	<p><i>PA Relay CAs are trained to type all conversation heard (including background sounds) and to read verbatim what is typed by the TTY user. If a caller requests ASL translation as a default, the CA will then translate the typed segment of the call to conversational English.</i></p>
<p>Types of Calls</p>	
<p>d 64.604 A.3.i CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.</p>	<p><i>AT&T Relay does not place any limits on sequential calls or the length of calls.</i></p>
<p>d 64.604 A.3.ii TRS shall be capable of handling any type of call normally provided by common carriers.</p>	<p><i>AT&T Relay services is capable of handling any type of call normally provided by common carriers. PA Relay is fully compliant with this FCC standard.</i></p>

<p>d 64.604 A.3.iii</p>	<p>Relay service providers are permitted to decline a call because credit authorization is denied.</p>	<p><i>AT&T Relay attempts to attain alternate billing information from callers. AT&T Relay declines calls when necessary due to credit being denied.</i></p>
<p>d 64.604 A.3.iv</p>	<p>Relay services shall be capable of handling pay-per-call calls.</p>	<p><i>AT&T Relay Services processes pay-per calls in an equivalent fashion to how they would be processed for hearing individuals.</i></p>
<p>Types of Calls</p>		
<p>d 64.604 A.3.v</p>	<p>TRS providers are required to provide the following types of TRS Calls: (1) text-to-voice and voice-to-text (2) VCO, two-line VCO, VCO-TTY, VCO-VCO, (3) HCO, two-line HCO, HCO-TTY, HCO-to HCO.</p>	<p><i>AT&T Relay Services processes the following call types for PA Relay callers: Text to Voice, Voice to Text, Voice to Voice, Text to VCO, VCO to Text, VCO to HCO, VCO with Privacy, Hearing to Hearing, HCO to VCO, Text to HCO, HCO with Privacy, HCO to Text, Two Line VCO, Speech-to-Speech, Spanish-to-Spanish, VCO-to-VCO, HCO-to-HCO, Two line HCO, Pay-Per-Calls (900).</i></p>
<p>d 64.604 A.3.vi</p>	<p>TRS Providers are required to provide call release, speed-dialing, and three way calling functionality.</p>	<p><i>AT&T Relay Services is fully-compliant with Call release regulations. AT&T Relay Services "releases" TTY-TTY calls after they are connected. Per-minute reimbursement ceases after a call is released from the CA position.</i></p>
	<p>TRS Providers are required to provide speed-dialing.</p>	<p><i>AT&T Relay Services encourages Relay Users to set up profiles containing their frequently called numbers. These numbers will be speed-dialed upon a customer's request</i></p>

<p>TRS Providers are required to provide three-way calling functionality.</p>	<p><i>AT&T Relay Services processes three-way calls for our customers. Customers utilize their "flash" button to join on two lines and the Relay CA then relays the three-way call.</i></p>
<p>Voicemail & Interactive Menus</p>	
<p>d 64.604 A.3.vii</p> <p>CA's must alert the TRS user to the presence of a recorded message & interactive menu thru a hot key on the CA's terminal.</p>	<p><i>AT&T Relay accepts upfront instructions from the caller which might include a note that they are dialing to a recorded message or interactive menu. Customers may provide upfront instructions on how to proceed with the call and which options to select. If no upfront instructions are given, the CA will dial to the recording, inform the caller a recording has been reached, and relay the complete recorded message.</i></p>
<p>TRS providers shall electronically capture recorded messages & retain them for the length of the call, & may not impose any charges for additional calls that must be made by the user in order to complete calls involving recorded or interactive messages.</p>	<p><i>AT&T Relay Oprs have electronic means to capture automated menus and type them verbatim to the caller. AT&T has methods in place to ensure that no additional charges are made for subsequent calls that need to be placed to complete calls terminating with a recorded message or interactive menu.</i></p>
<p>Answering Machine/ Voice Mail Message Retrieval</p>	
<p>d 64.604 A.3.viii</p> <p>TRS Providers shall provide, as TRS features, answering machine and voice mail retrieval.</p>	<p>Answering machine message retrieval or voice mailbox retrieval as a standard offering to our PA Relay customers.</p>

Handling of Emergency Calls		
d 64.604 A.4	At a minimum, TRS Providers must be able to pass emergency callers to the appropriate PSAP.	<i>AT&T Relay Services processes emergency calls in compliance with FCC regulations. Emergency calls are connected to the appropriate PSAPs.</i>
d 64.604 A.5	Relay Providers must offer STS callers an option of maintaining a list of numbers at the relay center.	<i>AT&T Relay Services offers STS callers the opportunity to set up a profile of speed-dialed numbers. When requested, an Operator will retrieve a number for the list, state the name and telephone number, and dial the number as requested.</i>
	This information must be transferred to any new provider.	<i>When required, AT&T Relay will provide STS user information to any new provider.</i>
Technical Standards		
d 64.604 A.5B (1)	ASCII & Baudot	
	TRS shall be capable of communicating with ASCII & Baudot format at any speed generally in use.	<i>As required, AT&T Relay's terminals, keyboards, and modems are compatible with TTY devices in service and are capable of receiving and accessing TTY calls at any Baud rate generally in use.</i>
d 64.604 A.5B (2).I	Speed of Answer	
	TRS shall include adequate staffing to ensure 85% of all calls answered within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold.	<i>PA Relay contract requires that 85% of all calls be answered in 10 seconds or less. By forecasting call volumes and staffing appropriately, AT&T Relay Services exceeds this requirement on a regular basis. An answer performance metric of 93%-99% of all calls answered in less than 10 seconds from the period of 2003-July 2007.</i>

<p>Abandoned calls shall be included in the speed-of-answer calculation.</p>	<p><i>As required, AT&T Relay Services includes abandoned calls in their speed-of-answer calculation.</i></p>
<p>Speed of Answer is to be measured on a daily basis.</p>	<p><i>Speed of Answer is monitored on a constant basis and overall results are reported to the state as required.</i></p>
<p>The system shall be designed to a P.01 standard.</p>	<p><i>AT&T Relay Services platform is engineered for a P.01 grade of service, wherein blockage rate will be measured by sampling the number of calls being blocked for each 24 hour period. Reports of less than 1 in 100, the functional equivalent for the blockage rate for voice users, indicate Pennsylvania Relay's full compliance with the FCC requirement for a P.01 standard.</i></p>
<p>d 64.604 B.3</p> <p>TRS users shall have access to their chosen IXC carrier through the TRS and to all other operator services, to the same extent that such access is provided to voice users.</p>	<p>Equal Access to IXCs</p> <p><i>Pennsylvania relay customers can select from a wide variety of carriers currently connected to the Relay platform. The Carrier-of-Choice platform for PA relay customers hosts over 40 IXC's. Processes are in place to add carriers to the list when requested by Pennsylvania Relay Customers.</i></p>
<p>d 64.604 B.4</p>	<p>TRS Facilities</p>

TRS shall operate everyday, 24 hours a day.

TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use. Adequate network facilities shall be used in conjunction with TRS.

AT&T Relay provides 24 hour service every day of the year that is backed up with redundancy of equipment and an uninterruptible power source in the center. Customers do not receive a busy signal due to loop trunk congestion.

AT&T Relay services exceeds the FCC requirement for network facilities.

<p>d 64.604 B.5</p>	<p>No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecomm to people with disabilities.</p>	<p style="text-align: center;">Technology</p> <p><i>AT&T Relay services exceed the FCC regulations for technology requirements. AT&T utilizes the newest switch technology to provide more functionally equivalent features for relay users. These include: - Functionally equivalent Caller ID – with the new switching technology required; a call block on the originating line can be detected and passed to the terminating call; Delivery of originating call information to a PSAP as described in Operator standards; Multiple customer profiles for multi-user households and for use away from the home NPA-NXX-XXXX.</i></p>
<p>d 64.604 B.6</p>	<p>Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.</p>	<p style="text-align: center;">Caller ID</p> <p><i>AT&T Relay Service's current architecture allows for the transmission of true caller ID. AT&T Relay Service's platform enables full compliance with all FCC rules regarding Caller ID and call blocking services</i></p>
<p>Functional Standards</p>		
<p>d 64.604 C.1</p>	<p>Consumer Complaint Logs</p>	

States must maintain a log of complaints including all complaints about TRS to include minimum include the date the complaint was filed, the nature of the complaint, the date of resolution and an explanation of the resolution.

AT&T Relay maintains logs of all complaints. Logs include all pertinent information including the date of the complaint, the nature of the complaint, and the explanation and date of resolution.

States & TRS providers shall submit to the FCC by July 1 of each year, summaries of logs indicating the number of complaints received for the 12-month period ending May 31.

Annual FCC reports are prepared and submitted by July 1st of each calendar year.

<p>d 64.604 C.2</p>	<p>Contact Persons</p>	<p>States must submit to the FCC a contact person or office for TRS consumer information and complaints about intrastate TRS.</p>	<p><i>Required information has been submitted by the State of Pennsylvania and AT&T Relay Services and is currently posted on the FCC website.</i></p>
<p>d 64.604 C.3</p>	<p>Public Access to Info</p>	<p>Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions, in phone directories, DA services, & incorporation of TTY numbers in phone directories, shall assure that callers are aware of all forms of TRS.</p>	<p><i>Pennsylvania exceeds this requirement. Pennsylvania oversees an extensive outreach and advertising campaign for Relay services. . Relay Service phone number listings are in phone books as well as other advertisements that target the Relay user-base.</i></p>
		<p>Conduct ongoing education and outreach programs to publicize availability of 711 access.</p>	<p><i>AT&T Relay employees as well as PA State employees regularly participate in outreach events and promote education of 711 dialing and other relay access and usage information.</i></p>
<p>d 64.604 C.4</p>	<p>Rates</p>		

d 64.604
C.5

Jurisdictional Separation of Costs

(i) General, where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set for in the Commission's regulations

AT&T Relay Services follows FCC requirements in the jurisdictional separation of costs.

TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination to the user. If the calling area he/she can use the Carrier of choice to bill the call. Relay users are billed according to their selected calling plan.

Pennsylvania Relay users pay rates that are equivalent to the rates paid for functionally equivalent voice communication services.

AT&T Relay Service's technology allows the system to detect the TRS user's local calling area and place calls that terminate within that area at no extra cost to the user. If the terminating number is outside the user's calling area he/she can use the Carrier of choice to bill the call. Relay users are billed according to their selected calling plan.

<p>(ii) Cost recovery, Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism</p>	<p><i>Interstate TRS costs are recovered from all subscribers for every interstate service utilizing the shared-funding cost recovery mechanism.</i></p>
<p>(iii) Telecommunications Relay Services Fund – To be administered by the National Exchange Carrier Association, Inc. (NECA)</p>	<p><i>Interstate Relay Calls are reimbursed by the NECA fund.</i></p>
<p>d 64.604 C.6</p> <p>(i) Referral of complaint,</p> <p>(ii) Intrastate complaint resolution,</p> <p>(iii) Jurisdiction of Commission,</p> <p>(iv) Interstate complaint resolution,</p> <p>(v) Complaint Procedures</p>	<p>Complaints</p> <p><i>The State of Pennsylvania along with AT&T Relay Services have a comprehensive Customer Contact process that is fully compliant with all FCC Requirements.</i></p>
<p>d 64.604 C.7</p>	<p>Treatment of TRS Customer Info</p>

Future contacts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service, and shall not be sold, distributed, shared or revealed in any other way by the relay provider or its employees unless compelled to do so by lawful order.

AT&T Relay Services is aware and will comply with the stipulation that incumbent Relay Providers, upon loss of the contract, will transfer all customer information to the new vendor. AT&T Relay is fully aware of this requirement will provide information to a new relay provider when necessary. AT&T Relay does not use Relay Customer information for any purpose other than conducting relay business.

d 64.605

State Certification

Per FCC's Public Notice on TRS State Re-certification released 5/1/02, the FCC requests an application be submitted through State's Office of the Governor or other delegated executive office empowered to provide TRS.

AT&T Relay Services assists the states we provide Relay Services for with in preparation of re-certification documentation.

Appendix

No. 6.3

ATT CA Training and Confidentiality

COMMUNICATIONS ASSISTANT TRAINING



AT&T Relay Services - Initial Training Outline

Here is an overview of the key topics covered in initial relay service training.

Module 1 – Introduction to the Relay Service

- Explanation of the Relay Service
- Identifying customers who use the Relay Service
- Explanation of how the Relay Service works
- The role of the Relay Operator
- The customers expectations for Relay Service
- Comparison of a relay call to a call with an Operator
- Availability of Relay Services
- Confidentiality and Code of Ethics – Rules for relaying calls
- Other Relay Operator requirements – FCC regulations

Module 2 – Introduction to TTY

- Background on the TTY
- The parts of a TTY
- Connecting a TTY to the Telephone System
- Explanation of how a TTY works
- How to use a TTY to place a call
- Other communication devices

Module 3 - Introduction to the Work Station and Call Conditions

- The kind of equipment used by a Relay Operator
- Information available to the Relay operator about the customer
- How to prepare billing records for relay calls
- Steps for processing Basic Relay Calls
- TTY to Voice & Voice to TTY
- In Call Replacement
- Relay Operator Relief Procedures
- Gender Request
- Relay Choice Profile (RCP)
- Personal Memory Dial (PMD)

Module 4 - ASL Translation / Interpretation

- ASL Translation/Interpretation as the Default
- ASL Grammar Rules
- Understanding ASL Translation/Interpretation
- Explanation of ASL Gloss
- Operator proficiency requirement in ASL / PSE Translation/Interpretation
- Procedures for obtaining Relief
- Identifying Translation/Interpretation preferences in the customers Relay Choice Profile

Module 5 - Introduction to Voice Carry-Over (VCO) Calls

- Explanation of Voice Carry-Over calls
- Procedures for processing VCO calls
- Profiled
- Not Profiled
- TTY to Voice
- Voice to TTY

Module 6 - Introduction to Basic Relay Calls

- Recorded Messages – Play Back Device (PBD)
- Procedures for placing calls to beepers/pagers
- Procedures for completing calls to toll free numbers such as 800, 866, 888, & 877
- Procedures for completing calls to directory assistance

Module 7 - CSIDS Module

- Description of common CSIDS keys
- CSIDS Quick Reference
- Emergency
- Domestic "General" rate quote
- Domestic "Computed" rate quote
- International "General" rate quote
- International "Computed" rate quote
- Collect/Calling Card billing to International Countries
- Canada
- Frequently asked questions & key actions
- Keyword Help

Module 7 - Emergency Calls

- What is considered an emergency call
- Steps for securing an emergency agency listing
- Emergency call handling procedures

Module 8 - Alternate Billing

- Steps for handling alternate billing requests
- Collect
- Third number
- Detariffing Order
- Person to Person
- Calling Cards
- Commercial Credit Cards
- Prepaid Calling Cards
- Procedures for handling calls from a Coin phone
- Special Treatment Window

Module 9 - Carrier of Choice (COC)

Identifying COC calls
COC specified in the customers Relay Choice Profile (RCP)
COC requested during call set-up
Customer indicates using a participating carrier's calling card
List of participating Carriers of Choice
Procedures for non participating carrier of choice requests
Steps for completing billing of COC requests

Module 10- Introduction to Special Call Handling and Call Types

711 Dialing
Spanish Voice and TTY transfers
900 Pay Per Call
Processing 900 number requests
Processing 900 Pay Per Call requests when terminating to a recorded message
Processing 900 Pay Per Call requests when answered by a live person
Calls that cannot be completed to a requested 900 number
511 Virginia
STS Overview
Identifying a Speech-to-Speech (STS) customer
Procedures for processing STS calls
Telebraille Customers (Pacing)
Hearing Carry-Over (HCO)
Explanation of HCO calls
Comparison of HCO calls to VCO calls
Procedures for processing HCO Calls

Specialty Call Types

Two-Line VCO or Voice Translation

Reverse Two-Line VOC or Voice Translation

Two-Line HCO or Hearing Translation

Voice to Voice (VTV)

Voice to TTY (VTT)

VCO Privacy

HCO Privacy

Hearing to Hearing (HTH)

VCO to HCO (VTH)

Touch-Tone Carry-Over (TCO)

3-Way Calling

Revised SLAM procedures

SLAM procedures

International Calls

Calls Terminating to another Relay Center

One Minute Hold Guidelines

Customer Contact Process (Request for Supervisor or Customer Care Desk)

Internet Relay

Module 11 -DNIS Switched Calls

Procedures for TTY to TTY calls

Relay to OSD

Relay to OSD to Relay

OSD to Relay

Module 12 -Introduction to OSD

Explanation of Operator Services for the Deaf (OSD)

Comparison of OSD to Relay Service

Type of calls that are permitted through OSD and availability

AT&T Provision of Service

FCC Order Ref. 90-571	FCC Requirement	AT&T RELAY SERVICES
Provision of Services		
d 64.603	<p>Each common carrier providing telephone voice transmission services shall provide, not later than July 26, 1993, in compliance with the regulations prescribed therein, throughout the area in which it offers services, telecommunications relay services, individually, through designees, through a competitively selected vendor, or in concert with other carriers.</p>	<p><i>AT&T Relay Services was the first organization to provide 24/7/365 relay services. AT&T recently celebrated 20 years of serving the Deaf/HOH community.</i></p>
	<p>Speech-to-speech relay service shall be provided by March 1, 2001.</p>	<p><i>AT&T is fully compliant with the FCC requirement of offering Speech-TO-Speech Relay Service. This is a standard offering via Pennsylvania Relay Services.</i></p>
	<p>Interstate Spanish language relay service shall be provided by March 1, 2001.</p>	<p><i>AT&T is fully compliant with the FCC requirement of offering Spanish language relay services.</i></p>
	<p>In addition, not later than October 1, 2001, access via the 711 dialing code to all relay services as a toll free call.</p>	<p><i>AT&T is fully compliant with 711 access to all of its Relay Services. Pennsylvania customers dial 711 and their calls are routed to our call-handling centers for processing.</i></p>
Operational Standards		
d 64.604 A.(1).l	<p>Communications Assistant (CA) Competency Skills</p> <p>CAs are to be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.</p>	<p><i>AT&T Relay exceeds this FCC standard by requiring that training of Relay CAs includes special call type processing, cross cultural training, and on-going training.</i></p>